

Honorable Brian A. Tsuchida

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MARSHA LINEHAN, an individual; and
BEHAVIORAL TECH RESEARCH, INC., a
Washington corporation,

Plaintiffs,

v.

MARIE INSTITUTE OF BEHAVIORAL
TECHNOLOGY d/b/a THE LINEHAN
INSTITUTE, a Washington nonprofit
corporation; and BEHAVIORAL
TECH, LLC, a Washington limited liability
company,

Defendants.

Case No. 2:21-cv-01330-RAJ-BAT

STIPULATION AND ORDER TO
EXTEND CASE DEADLINES

The parties, by and through their undersigned counsel and subject to the approval of the Court, hereby stipulate and agree that the following deadlines set forth in the Court's November 12, 2021 Order (Dkt. 14) shall be extended as set forth in the table below.

WHEREAS the Complaint was filed on September 29, 2021;

WHEREAS the parties are working in good faith to evaluate whether their disputes may be resolved;

WHEREAS discovery in this case has not started, and no trial date has been set;

NOW, THEREFORE, SUBJECT TO APPROVAL BY THE COURT, IT IS HEREBY
STIPULATED AND AGREED that the November 12, 2021 Order shall be modified to set the
following case deadlines:

| Event | Current | Proposed: |
|---|---------------|---------------|
| Deadline for Fed. R. Civ. P. 6(f) Conference | Dec. 10, 2021 | Jan. 28, 2022 |
| Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) | Dec. 27, 2021 | Feb. 14, 2022 |
| Combined Joint Status Report and Discovery Plan as Required by Fed. R. Civ. P. 26(f) and Local Civil Rule 26(f) | Jan. 7, 2022 | Feb. 25, 2022 |

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: November 30, 2021.

Respectfully submitted,

/s/ Bina B. Yeung

Bina B. Yeung WSBA No. 44065

E-mail: byeung@cairncross.com

Michael Atkins WSBA No. 26026

E-mail: matkins@cairncross.com

Troy Hatfield WSBA No. 53030

E-mail: thatfield@cairncross.com

CAIRNCROSS & HEMPELMANN, P.S.

524 Second Avenue, Suite 500

Seattle, WA 98104-2323

Telephone: (206) 587-0700

Facsimile: (206) 587-2308

Attorneys for Plaintiffs

/s/ Douglas A. Grady

Douglas A. Grady, WSBA No. 36100

BAKER & HOSTETLER LLP

999 Third Avenue

Suite 3900

Seattle, WA 98104-4076

Tel: 206.332.1380

FAX: 206.624.7317

E-mail: dgrady@bakerlaw.com

Attorney for Defendants

[PROPOSED] ORDER

It is so ORDERED that pursuant to the parties' stipulation (Dkt. 15), the following case deadlines shall be extended as set forth below.

| | |
|---|---------------|
| Deadline for Fed. R. Civ. P. 6(f) Conference | Jan. 28, 2022 |
| Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) | Feb. 14, 2022 |
| Combined Joint Status Report and Discovery Plan as Required by Fed. R. Civ. P. 26(f) and Local Civil Rule 26(f) | Feb. 25, 2022 |



BRIAN A. TSUCHIDA
United States Magistrate Judge

Presented by:

/s/ Binah B. Yeung

Binah B. Yeung WSBA No. 44065
CAIRNCROSS & HEMPELMANN, P.S.
E-mail: byeung@cairncross.com
524 Second Avenue, Suite 500
Seattle, WA 98104-2323
Telephone: (206) 587-0700
Facsimile: (206) 587-2308

Attorneys for Plaintiffs

/s/ Douglas A. Grady

Douglas A. Grady, WSBA No. 36100
BAKER & HOSTETLER LLP
999 Third Avenue
Suite 3900
Seattle, WA 98104-4076
Tel: 206.332.1380
FAX: 206.624.7317
E-mail: dgrady@bakerlaw.com

Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

November 30, 2021. s/ Laetitia Knox